

Bridgeville Glass Plant GE Lighting, LLC Mayer Street Bridgeville, PA 15017

February 18, 2002

Mr. John A. Armstead, Director Waste and Chemical Management Division (3WC22) EPA Region III 1650 Arch Street Philadelphia, PA 19103-2029

Subject: GE Bridgeville Glass Plant

Bridgeville, PA

USEPA I.D. No. PAD 06 068 2622

2001 Corrective Action Effectiveness Monitoring Annual Report

Dear Mr. Armstead:

As required by the subject permit, please find enclosed the 2001 Corrective Action Effectiveness Monitoring Annual Report. The report contains a description of the activities completed along with a brief discussion of the results.

This report was prepared by our consultant, RMT, Inc. If you need additional information or have any questions, please contact Mr. Dennis Correia, Technical Manager – Environmental Programs at General Electric Company (216) 266-2390.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment of knowing violations.

Sincerely,

George J. Lopuchovsky - Plant Manager

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Attachments:

cc: PA DER - Bureau of Waste Management Allegheny County Health Department Township of Collier



2001 Corrective Action Effectiveness Monitoring Annual Report

General Electric Company

Bridgeville Glass Plant

February 2002

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Rebecca L. Armes

Project Environmental Scientist

Russell K. Schlecht, P.E.

Project Manager

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First and Third Quarter 2001 Groundwater Monitoring Reports and Second and Fourth Quarter 2001 Water Level Measurements (Chester)

Section 1 Introduction

This annual report summarizes the results of corrective action groundwater monitoring activities conducted at the General Electric Company Bridgeville Glass Plant (GE-Bridgeville) in Bridgeville, Pennsylvania, in 2001. GE-Bridgeville conducts semiannual groundwater sampling at the site in March and September of each year. In addition, groundwater elevation data is collected quarterly during the year. Reports of corrective action monitoring activities are submitted to the United States Environmental Protection Agency (USEPA) on an annual basis. This annual report presents a summary of the semiannual groundwater sampling events conducted in March and September 2001 and the groundwater elevation data collected in March, June, September, and December 2001.

1.1 Background

GE-Bridgeville is a manufacturer of glass tubing used in the manufacture of light bulbs. The facility is located north of Bridgeville in Allegheny County, Pennsylvania. The facility was originally built in 1907 and operated by the Higbee Glass Company. GE purchased the facility in 1919. Historically (1919 through 1979), the facility disposed of its industrial wastes in an onsite landfill. The fill material consists of cinders, off-spec glass, refractory brick, air emissions control dust, and debris from plant operations. Some of these materials are considered Resource Conservation and Recovery Act (RCRA) hazardous under the D006 and D008 waste codes. A groundwater quality assessment conducted in 1986 as a result of the facility's Part B permitting process indicated impact to groundwater from the landfill.

GE-Bridgeville performs groundwater monitoring of the surficial aquifer beneath the facility to address corrective action requirements as specified by 40 CFR § 264.101. Corrective action measures related to the on-site solid waste landfill were completed in 1992. The corrective measures included construction of a surface asphalt/concrete cap, installation of a groundwater recovery trench, and construction of a sheetpile wall adjacent to Chartiers Creek. Facility groundwater monitoring was initiated in accordance with the Hazardous and Solid Waste Amendment Act (HSWA) Permit for Corrective Action for the landfill issued by USEPA Region III in October 1990. The facility's original HSWA permit was subsequently modified in November 1992, May and December 1993, and April 1998. Modifications included changing the monitoring well sampling frequency from quarterly to semiannually and revising the groundwater monitoring parameter list. The site-specific parameter list was modified to consist of pH and total and dissolved arsenic, barium, cadmium, chromium, and lead. Chloride,

phenols, sulfate, specific conductance (SC), total organic carbon (TOC), total organic halogens (TOX), total petroleum hydrocarbons (TPH), total sodium, and total and dissolved iron and manganese were removed from the previous list of parameters.

Under the conditions of the April 1998 modified HSWA permit, facility groundwater sampling is conducted semiannually to evaluate groundwater quality in the surficial aquifer underlying the GE-Bridgeville facility. Groundwater samples are collected from facility wells, including background-monitoring wells, to meet facility corrective action groundwater monitoring requirements.

1.2 Facility Description

The GE-Bridgeville site encompasses approximately 10 acres and is generally flat. Site elevations, excluding the Chartiers Creek floodplain area, range from 802 feet to 811 feet National Geodetic Vertical Datum (NGVD). The site is bounded to the north by Mayer Street and a Wheeling and Lake Erie railroad track. Chartiers Creek and a Conrail railroad track are located to the south and southwest of the site, and a partially abandoned Universal Cyclops steel mill is located to the east. A three-story brick manufacturing building with offices and an asphalt parking area occupy the northwestern portion of the site.

The central portion of the site is occupied by a landfill. The surface area of the landfill is approximately 3.6 acres with a variable thickness of five to ten feet. The southern portion of the landfill is immediately adjacent to Chartiers Creek. Much of the landfill area is an integral part of plant operations including truck parking and turn-around, raw material unloading, material storage, and hazardous waste storage. Formerly, propane and fuel oil were also stored in this area.

The southwestern portion of the property is primarily a floodplain area adjacent to Chartiers Creek and is wooded. Chartiers Creek is a meandering stream that flows in a southerly direction and ultimately discharges into the Ohio River. The distance from the plant to the confluence of Chartiers Creek and the Ohio River is approximately 12 miles.

1.3 Monitoring Wells

The facility corrective action groundwater monitoring program currently includes a system of seven corrective action effectiveness monitoring (CAEM) wells screened in subsurface materials located beneath and downgradient of the landfill and four supplemental monitoring wells. Three of the supplemental monitoring wells, MW-02, MW-16, and MW-17 are located upgradient of the landfill, and one well, MW-21, is located off-site across Chartiers Creek. These eleven wells are located to monitor the effectiveness of corrective action measures completed in 1992 related to the on-site solid waste landfill designated as a solid waste

management unit (SWMU). Two additional wells, MW-01R and MW-15R, are included as monitoring locations indicative of background conditions of the water-bearing zone. Six performance monitoring wells are utilized to evaluate groundwater elevation within the fill material. Table 1-1 lists the 19 facility monitoring wells.

1.4 Purpose

The purpose of this report is to summarize the results of the corrective action groundwater monitoring activities conducted at GE-Bridgeville in 2001 in accordance with the HSWA permit issued for the site and the Final Permit Modifications issued in April 1998 by USEPA. This permit addresses corrective action requirements specified by 40 CFR § 264.101. The permit requires the facility to report the following information no later than March 1 following each calendar year:

- Concentrations or values of each parameter listed in the permit for each alluvial groundwater quality monitoring well
- Statistically significant exceedance of the applicable compliance limit for each constituent in each CAEM well located beneath and downgradient of the landfill
- Results of an evaluation of groundwater elevations in each of the performance monitoring wells

In addition, this report includes a discussion of trends in groundwater conditions observed in the supplemental wells located upgradient of the landfill and a comparison of constituent concentrations detected in CAEM and supplemental wells during 2001 to applicable Maximum Contaminant Levels (MCLs).

1.5 Methods and Scope

Groundwater samples and water level measurements were collected following protocols outlined in the USEPA-approved *Quality Assurance Project Plan* (QAPP; Law, October 31, 1995). Groundwater samples and water level measurements were collected by Chester Engineers (Chester) of Pittsburgh, Pennsylvania for the semiannual groundwater sampling and quarterly water level measurement events. Groundwater samples collected from the CAEM and supplemental monitoring wells were shipped to EnChem, Inc. (EnChem) in Madison, Wisconsin for analysis. RMT, INC. (RMT) in Atlanta, Georgia has prepared this report of these activities.

1.6 Analytical Program

Groundwater samples are collected semiannually from the 13 alluvial groundwater quality monitoring wells. These samples are analyzed in accordance with the USEPA-approved QAPP. Samples are collected from monitoring wells that are both upgradient and downgradient of the landfill. Groundwater samples are analyzed for the indicator parameter pH and the five inorganic parameters arsenic, barium, cadmium, chromium, and lead. Table 1-2 lists parameters and applicable methods. Table 1-3 is a list of monitoring well sampling requirements.

1.6.1 Groundwater Indicator Parameters

Indicator parameters are broad measures of groundwater conditions and are expected to be relatively constant throughout an aquifer. The indicator parameter pH is required to be monitored at the GE-Bridgeville site by the modified HSWA permit.

During each semiannual sampling event, four replicate groundwater samples are collected from the CAEM and supplemental wells indicated on Table 1-3 and analyzed in the field for pH. The purpose of the four replicate analyses is to reduce the likelihood of sampling and laboratory errors affecting the results obtained for groundwater samples collected from each well, which reduces false positive indications of affected groundwater.

1.6.2 Inorganic Parameters

Groundwater samples are analyzed for metals that were either processed in significant quantities at the site or that have been detected on at least one occasion in at least one monitoring well during earlier facility monitoring. The site inorganic parameters are as follows:

- Arsenic
- Barium
- Cadmium
- Chromium
- Lead

One filtered groundwater sample and one unfiltered groundwater sample are collected from each well and analyzed for the five inorganic parameters during each semiannual sampling event.

1.7 Analyses and Data Results

Analytical data obtained during the semiannual sampling events for the five inorganic parameters are statistically evaluated and compared to the greater of either the Safe Drinking Water Act (SDWA) MCL or background mean for each constituent per Section III.A of the May 1993 modified HSWA Permit (USEPA, 1993). Background means are calculated using pooled data obtained from background wells MW-01R and MW-15R during the eight most recent sampling events. The use of this moving average background data set allows for comparison to the most current background conditions. The greater of either the MCL or the moving average background concentration is then used as the compliance limit for each constituent. If an MCL does not exist for a particular constituent, the compliance limit is defined as the constituent-specific moving average background concentration. The compliance limit for each parameter is statistically compared to the groundwater data obtained from each downgradient well during the eight most recent sampling events. The appropriate statistical method is selected based on the characteristics of the downgradient groundwater data set and the applicable compliance limit. Aquifer impacts are suggested when the downgradient groundwater data exceeds the applicable compliance limit.

For constituents using the MCL as the compliance limit, a tolerance interval having 95 percent coverage and 95 percent confidence was constructed for that constituent from downgradient groundwater data obtained during the eight most recent sampling events.

For constituents using the moving average background concentration as the compliance limit, a confidence interval having a 99 percent confidence level was constructed from downgradient groundwater data obtained during the eight most recent sampling events.

Downgradient monitoring well MW-06R was abandoned on August 27, 1998, due to damage and MW-06RR was installed on August 28, 1999, as a replacement well. Because current statistical analysis methods evaluate data obtained from the eight most recent sampling events, data obtained from MW-06R is included in the data set for MW-06RR.

1.8 Static Water Level Elevation Measurement

Groundwater elevation measurements are collected quarterly to evaluate hydraulic gradient and groundwater flow velocity in the water table aquifer at the GE-Bridgeville site. Water level measurements are collected during the same day for each sampling event to minimize temporal water level elevation differences. Table 1-3 includes a list of facility well locations where water level elevation measurements are collected. Water levels within the groundwater collection sump and Chartiers Creek were also measured.

Table 1-1 Groundwater Monitoring Program

WELL DESIGNATION	PURPOSE			
MW-01R	Cita haskeround wells			
MW-15R	Site background wells			
MW-03				
MW-04				
MW-06RR				
MW-07	Downgradient CAEM monitoring wells			
MW-08AR				
MW-12A				
MW-20				
MW-02				
MW-16	Upgradient supplemental monitoring wells			
MW-17				
MW-21	Off-site supplemental monitoring wells			
MW-05				
MW-08R				
MW-09R	Groundwater elevations within			
MW-10	fill materials			
MW-12				
MW-14R				

Table 1-2 Groundwater Monitoring Parameters and Methods

PARAMETER	METHOD	PRACTICAL QUANTITATION LIMIT (mg/L)
Arsenic (1)	USEPA 7060	0.005
Barium ⁽¹⁾	USEPA 6010	0.02
Cadınium (1)	USEPA 6010	0.005
Chromium (1)	USEPA 6010	0.05
Lead (1)	USEPA 7421	0.005
рН	USEPA 9040	NA

Both filtered and unfiltered groundwater samples are collected for dissolved and total inorganic analysis, respectively.

NA Not applicable

Table 1-3
Groundwater Monitoring Well Sampling Requirements

SAMPLING FREQUENCY	SAMPLING PARAMETERS	MONITORING WELLS	NUMBER OF SAMPLES FOR EACH WELL
Semiannual (March and September)	Arsenic, barium, cadmium, chromium, lead, and pH	MW-01R, MW-02, MW-03, MW-04, MW-06RR, MW-07, MW-08AR, MW-12A, MW-15R, MW-16, MW-17, MW-20, and MW-21	One filtered and one unfiltered sample will be collected for each inorganic parameter.
Quarterly (March, June, September, and December)	Water level measurements	MW-05, MW-08R, MW-09R, MW-10, MW-12, and MW-14R	Not applicable

Section 2 Analytical Approach

This section presents the analytical results obtained from analyses of groundwater samples collected during the semiannual sampling events conducted in 2001 at the GE-Bridgeville site to evaluate the effectiveness of corrective actions implemented at the site.

2.1 Sampling and Analysis

Groundwater samples were collected from 13 facility monitoring wells by personnel from Chester on March 13 through March 15, 2001, and September 19 through September 21, 2001, for the two semiannual monitoring events to evaluate groundwater quality.

Groundwater samples were collected according to the modified permit and procedures described in the USEPA-approved QAPP. "Monitoring Well Sampling Reports," which were completed during sampling for each monitoring well during each sampling event, are contained in Appendix B of First Quarter - March 2001 Groundwater Monitoring Report (Chester, May 2001) and Third Quarter - September 2001 Groundwater Monitoring Report (Chester, November 2001). The monitoring well sampling reports contain the following information:

	INFORMATION		WELL INFORMATION		PURGE INFORMATION
-	Project name	-	Water level measurement	-	Sample identification
-	Project number	_	Was well locked or sealed?	_	Date purged
-	Location	_	Was protection in place	-	Start time
-	Sampling team	-	Length of stick up to survey point	-	Static water level before purge
-	Well number		Condition of well collar	_	One purge volume
-	Date collected	_	Weather conditions	_	Total purge volume
-	Time collected	_	Comments	_	Total purge time
				_	pН
l				_	Specific conductivity
					Temperature
					Turbidity (subjective)

During the semiannual monitoring events, both filtered and unfiltered groundwater samples were collected and analyzed for the following five inorganic parameters: arsenic, barium, cadmium, chromium, and lead. Sample analyses were performed by EnChem, which is a USEPA-approved analytical laboratory. Analytical results from the March 2001 semiannual sampling event are summarized in Table 2-1, and analytical results from the September 2001 semiannual sampling event are summarized in Table 2-2. Chain-of-custody documentation is included in the semiannual groundwater monitoring reports, which are included in Appendix A.

2.2 Data Evaluation

Following data validation, the groundwater data were statistically analyzed as discussed in Subsection 1.7 to evaluate the effectiveness of corrective action measures implemented at the site. To date, statistical analyses have been performed on groundwater data obtained from 28 sampling events occurring from the first quarter of 1993 to the third quarter of 2001.

The historical data obtained from the three supplemental wells located upgradient of the landfill since corrective action was initiated in the first quarter of 1993 were statistically evaluated to assess trends in constituent concentrations. In addition, historical data from site wells were evaluated using time versus concentration graphs. Constituent concentrations detected in groundwater samples collected from CAEM and supplemental wells during the 2001 reporting period were also directly compared to applicable MCLs.

Results of the data evaluation are discussed in Section 3.

Table 2-1
Summary of Laboratory Analytical Results
March 2001

				LOCATION	SAMPLE DATE			
		BACKG	ROUND	SUPPLEMENTAL WELLS				
PARAMETERS ⁽¹⁾	MCLs ⁽²⁾	MW-01R 03/13/2001	MW-15R 03/13/2001	MW-02 03/14/2001	MW-16 03/14/2001	MW-17 03/14/2001	MW-21 03/15/2001	
Arsenic	0.05	<0.005	< 0.005	< 0.005	<0.005	0.0066	<0.005	
Arsenic, dissolved	0.05	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	
Barium	2	0.033	0.035	0.062	0.076	0.13	0.049	
Barium, dissolved	2	0.033	0.034	0.054	0.067	0.086	0.032	
Cadmium	0.005	< 0.005	<0.005	< 0.005	<0.005	0.057	<0.005	
Cadmium, dissolved	0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	
Chromium	0.1	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	
Chromium, dissolved	0.1	<0.05	<0.05	<0.05	< 0.05	<0.05	<0.05	
Lead	0.015(3)	<0.005	<0.005	<0.005	<0.005	0.027	< 0.005	
Lead, dissolved	0.015 ⁽³⁾	< 0.005	< 0.005	<0.005	< 0.005	<0.005	<0.005	

		LOCATION/SAMPLE DATE									
		CAEM WELLS									
PARAMETERS ⁽¹⁾	MCLs ⁽²⁾	MW-03 03/14/2001	MW-04 03/15/2001	MW-06RR 03/15/2001	MW-07 03/14/2001	MW-08AR 03/15/2001	MW-12A 03/14/2001	MW-20 03/14/2001			
Arsenic	0.05	0.0051	< 0.005	< 0.005	<0.005	0.016	<0.005	0.017			
Arsenic, dissolved	0.05	< 0.005	< 0.005	< 0.005	<0.005	0.016	<0.005	<0.005			
Barium	2	0.074	0.095	0.093	0.11	0.035	0.12	0.12			
Barium, dissolved	2	0.072	0.085	0.067	0.097	0.024	0.13 DA	0.11			
Cadmium	0.005	<0.005	<0.005	<0.005	< 0.005	<0.005	<0.005	<0.005			
Cadmium, dissolved	0.005	< 0.005	<0.005	<0.005	< 0.005	< 0.005	<0.005	< 0.005			
Chromium	0.1	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05			
Chromium, dissolved	0.1	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05			
Lead	0.015(3)	<0.005	0.023	0.018	0.03	0.005	0.0097	<0.005			
Lead, dissolved	0.015 ⁽³⁾	< 0.005	<0.005	<0.005	<0.005	< 0.005	< 0.005	<0.005			

⁽¹⁾ Analytical results are reported in milligrams per liter (mg/L) unless otherwise noted.

Shading indicates value exceeds applicable MCL

⁽²⁾ Maximum Contaminant Level (National Primary Drinking Water Standards)

⁽³⁾ MCL does not exist for lead. The Action Level for lead is 0.015 mg/L.

DA - Dissolved analyte greater than total analyte; analyses passed QC based on precision criteria.

< - Concentration less than the Quantitation Limit.

Table 2-2
Summary of Laboratory Analytical Results
September 2001

		LOCATION/SAMPLE DATE								
		BACKG	ROUND	SUPPLEMENTAL WELLS						
PARAMETERS ⁽¹⁾	MCLs ⁽²⁾	MW-01R 09/19/2001	MW-15R 09/19/2001	MW-02 09/19/2001	MW-16 09/20/2001	MW-17 09/21/2001	MW-21 09/20/2001			
Arsenic	0.05	0.0085	< 0.005	<0.005	< 0.005	0.0069	<0.005			
Arsenic, dissolved	0.05	<0.005	< 0.005	<0.005	< 0.005	0.0063	<0.005			
Barium	2	0.035	0.039	0.059	0.06	0.11	0.044			
Barium, dissolved	2	0.034	0.04	0.055	0.057	0.089	0.036			
Cadmium	0.005	<0.005	<0.005	<0.005	<0.005	0.011	< 0.005			
Cadmium, dissolved	0.005	<0.005	<0.005	<0.005	<0.005	< 0.005	< 0.005			
Chromium	0.1	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05			
Chromium, dissolved	0.1	<0.05	< 0.05	<0.05	<0.05	<0.05	<0.05			
Lead	0.015 ⁽³⁾	<0.005	<0.005	< 0.005	0.011	< 0.005	< 0.005			
Lead, dissolved	0.015 ⁽³⁾	<0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005			

				LOCA	ATION/SAMPLE I	DATE					
		CAEM WELLS									
PARAMETERS ⁽¹⁾	MCLs ⁽²⁾	MW-03 09/19/2001	MW-04 09/21/2001	MW-06RR 09/21/2001	MW-07 09/20/2001	MW-08AR 09/21/2001	MW-12A 09/20/2001	MW-20 09/20/2001			
Arsenic	0.05	<0.005	< 0.005	<0.005	<0.005	0.0072	0.0069	0.0099			
Arsenic, dissolved	0.05	<0.005	< 0.005	< 0.005	<0.005	< 0.005	0.0052	<0.005			
Barium	2	0.087	0.091	0.09	0.086	0.021	0.13	0.12			
Barium, dissolved	2	0.072	0.079	0.064	0.085	<0.02	0.13	0.12			
Cadmium	0.005	< 0.005	<0.005	0.0074	< 0.005	< 0.005	<0.005	<0.005			
Cadmium, dissolved	0.005	<0.005	< 0.005	<0.005	< 0.005	<0.005	<0.005	<0.005			
Chromium	0.1	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05			
Chromium, dissolved	0.1	< 0.05	<0.05	<0.05	<0.05	<0.05	<0.05	< 0.05			
Lead	0.015 ⁽³⁾	<0.005	0.023	0.15	<0.005	<0.005	<0.005	< 0.005			
Lead, dissolved	0.015 ⁽³⁾	<0.005	<0.005	0.035	<0.005	<0.005	< 0.005	< 0.005			

⁽¹⁾ Analytical results are reported in milligrams per liter (mg/L) unless otherwise noted.

Shading indicates value exceeds applicable MCL

⁽²⁾ Maximum Contaminant Level (National Primary Drinking Water Standards)

⁽³⁾ MCL does not exist for lead. The Action Level for lead is 0.015 mg/L.

< - Concentration less than the Quantitation Limit.

Section 3 **Analytical Results for 2001**

This section discusses the statistical program and summarizes the results of the statistical evaluation of groundwater data obtained during each semiannual sampling event conducted in 2001. Results of the direct comparison of applicable MCLs to constituent concentrations detected in groundwater samples collected from CAEM and supplemental wells during the 2001 semiannual sampling events are also presented. Statistical analyses and direct comparison of constituent concentrations to MCLs were performed by RMT.

3.1 Statistical Evaluation

Analytical results for site inorganic parameters of concern were statistically compared to the greater of either applicable MCLs or moving average background concentrations. Background means are established using pooled groundwater data obtained from background wells MW-01R and MW-15R during the eight most recent sampling events. This procedure results in a moving average background concentration for each constituent. Table 3-1 summarizes applicable MCLs and moving average background concentrations for each constituent for the March 2001 and September 2001 semiannual sampling events. Groundwater data obtained from downgradient wells, as well as background wells, during the eight most recent sampling events were statistically evaluated for basic parameters such as distribution and central tendency. The appropriate statistical method for comparison of downgradient data to applicable compliance limits (i.e., moving average background concentration or MCL) was selected based on the characteristics identified for each data set. If a constituent statistically exceeded the applicable compliance limit, USEPA was notified as specified in the HSWA permit.

If the constituent-specific MCL was greater than the applicable moving average background concentration, the tolerance interval approach was used to compare downgradient concentrations to the compliance limit. Parametric tolerance intervals were constructed to achieve 95 percent coverage and 95 percent confidence using downgradient groundwater data obtained from individual wells during the eight most recent sampling events. Restricting the data set to the eight most recent observations increases the possibility of a false positive if a nonparametric tolerance limit must be utilized but reduces the possibility that the analysis will be biased by site conditions that no longer exist. This procedure was used to be consistent with previous statistical analyses performed for the site. Nonparametric tolerance intervals require a minimum of nineteen observations to maintain a low false positive rate and high coverage.

Where the use of nonparametric tolerance limits were required, 95 percent coverage and 95 percent confidence could not be achieved, because the percent confidence/percent coverage is a function of sample size. By limiting the sample size to the eight most recent observations, the percent confidence is lowered even though the percent coverage remains at 95 percent. In this instance, nonparametric tolerance intervals are sacrificing a low false positive rate for the use of the eight most recent sampling events. A statistically significant exceedance of the compliance limit is suggested when the upper limit of the tolerance interval exceeds the MCL.

If the constituent-specific moving average background concentration was greater than the applicable MCL, the confidence interval approach was used to compare downgradient concentrations to the compliance limit. The confidence interval was constructed to achieve a 99 percent confidence level using downgradient groundwater data obtained from individual wells during the eight most recent sampling events. A statistically significant exceedance of the compliance limit is suggested when the entire confidence interval exceeds the moving average background concentration.

3.1.1 Results for March and September 2001 Semiannual Sampling Events

The applicable MCL was greater than the moving average background concentration for total and dissolved arsenic, barium, cadmium, and chromium for the first and third quarter semiannual sampling events conducted in March and September 2001, respectively. Therefore, the tolerance interval method was required to compare downgradient concentrations of these constituents to the applicable March and September 2001 compliance limit. An MCL is not available for total or dissolved lead. Therefore, the moving average background concentration was used as the compliance limit for total and dissolved lead for the first and third quarter semiannual sampling events conducted in March and September 2001, respectively. As a result, the confidence interval method was required to compare total and dissolved lead concentrations detected in groundwater samples collected from downgradient wells to applicable March and September 2001 compliance limits. Table 3-2 presents the results of the statistical analyses performed for the March and September 2001 semiannual sampling events.

Arsenic

For the 2001 reporting period, the compliance limit for total and dissolved arsenic was defined as the MCL (0.05 parts per million (ppm)). Therefore, exceedance of the compliance limit was evaluated using the tolerance interval approach. Statistical evaluation indicated total and dissolved arsenic concentrations detected in groundwater samples collected from downgradient

3-2

CAEM well MW-06RR during the eight most recent sampling events exceeded the applicable compliance limit for both semiannual sampling events conducted in 2001. These exceedances are primarily due to a detection occurring in April 1998. Total arsenic was not detected in unfiltered groundwater samples collected from downgradient CAEM well MW-06RR during either semiannual sampling event conducted in 2000 or 2001. Dissolved arsenic has not been detected in filtered goundwater samples collected from this well since April 1998. Total and dissolved arsenic concentrations detected in groundwater samples collected from the remaining downgradient CAEM wells did not exceed the compliance limit.

Barium

The compliance limit for total and dissolved barium was defined as the MCL (2 ppm). Therefore, exceedance of the compliance limit was evaluated using the tolerance interval approach. Statistical evaluation indicated total and dissolved barium concentrations detected in groundwater samples collected from downgradient CAEM wells during the eight most recent sampling events did not exceed the applicable compliance limit for these wells during either semiannual sampling event conducted in 2001.

Cadmium

Prior to first quarter 1998, the compliance limit for cadmium was defined by the background mean, because the background mean was greater than the MCL for this constituent. The background mean for cadmium has decreased over time primarily due to a decrease in detection limit by the analytical laboratory from 0.01 ppm prior to the first quarter of 1998 to 0.005 ppm in subsequent sampling events. Therefore, the compliance limit has shifted from the background mean to the MCL. As a result, exceedances of the cadmium compliance limit are now evaluated using the tolerance interval approach rather than the confidence interval approach.

Fewer exceedances of the cadmium compliance limit occurred in 2000 and 2001 compared to previous years. This reduction in exceedances of the cadmium compliance limit is likely related to the lower detection limit. When calculating tolerance intervals, downgradient constituent concentrations reported as not detected are replaced with values representing one-half the detection limit. In addition, data sets are restricted to the eight most recent sampling events. Data sets used to construct tolerance intervals for downgradient wells in 2001

consisted of a larger proportion of concentrations reported below the lower detection limit of 0.005 ppm than were reported in 1999. Therefore, tolerance intervals calculated in 2001 are less influenced by the higher detection limit than tolerance intervals calculated in 1999.

Statistical evaluation indicated total cadmium concentrations detected in groundwater samples collected from downgradient wells MW-03, MW-06RR, MW-07, MW-08AR, and MW-12A during the eight most recent sampling events exceeded the applicable compliance limit for both semiannual sampling events conducted in 2001. Exceedance of the total cadmium compliance limit identified for groundwater samples collected from downgradient CAEM well MW-08AR is the result of a single detection occurring during the September 2000 sampling event. Prior to September 2000, total cadmium had not been detected in groundwater samples collected from this downgradient CAEM well since March 1997. Exceedance of the total cadmium compliance limit identified for groundwater samples collected from MW-07 and MW-12A for both sampling events, MW-06RR for the first quarter sampling event, and MW-03 for the third quarter sampling event was the result of a single detection occurring in September 1999 or earlier.

Cadmium was detected in unfiltered groundwater samples collected from five monitoring wells during the eight most recent sampling events used to construct first quarter 2001 tolerance intervals: MW-03 during the December 1997 and April 1998 sampling events (0.022 ppm and 0.011 ppm cadmium, respectively); MW-06RR during the September 1999 sampling event (0.007 ppm cadmium); MW-07 during the September 1999 sampling event (0.0077 ppm cadmium); MW-08AR during the September 2000 sampling event (0.0063 ppm cadmium), and MW-12A during the September 1999 sampling event (0.0155 ppm cadmium). Cadmium was detected in groundwater samples collected from five monitoring wells during the eight most recent sampling events used to construct third quarter 2001 tolerance intervals: MW-03 during the April 1998 sampling event (0.011 ppm cadmium); MW-06RR during the September 1999 and September 2001 sampling events (0.007 ppm and 0.0074 ppm cadmium, respectively); MW-07 during the September 1999 sampling event (0.0077 ppm cadmium); MW-08AR during the September 2000 sampling event (0.0063 ppm cadmium); MW-12A during the September 1999 sampling event (0.0155 ppm cadmium).

Dissolved cadmium was not detected in filtered groundwater samples collected from background or downgradient CAEM wells.

Chromium

For the 2001 reporting period, the compliance limit for total and dissolved chromium was defined as the MCL (0.1 ppm). Therefore, exceedance of the compliance limit was evaluated using the tolerance interval approach. Statistical evaluation indicated total chromium concentrations detected in unfiltered groundwater samples collected from downgradient CAEM well MW-06RR during the eight most recent sampling events exceeded the applicable compliance limit for both semiannual sampling events conducted in 2001. These exceedances are due to a single detection occurring in September 1999. Total chromium was not detected in unfiltered groundwater samples collected from downgradient CAEM well MW-06RR during either semiannual sampling event conducted in 2001. Total chromium was not detected in unfiltered groundwater samples collected from the remaining downgradient CAEM wells during the eight most recent sampling events used to construct tolerance intervals for the March and September 2001 semiannual sampling events. Therefore, total cadmium concentrations detected in these remaining CAEM wells did not exceed the applicable compliance limit for the March and September 2001 semiannual sampling events.

Dissolved chromium was not detected in filtered groundwater samples collected from background or downgradient CAEM wells during the eight most recent sampling events. Therefore, dissolved chromium concentrations detected in groundwater samples collected from downgradient CAEM wells did not exceed applicable compliance limits for either semiannual sampling event conducted in 2001.

Lead

The compliance limit for total and dissolved lead was defined as the moving average background concentration (0.003 ppm) for the 2001 reporting period. Therefore, exceedance of the compliance limit was evaluated using the confidence interval approach. Statistical evaluation indicated total lead concentrations detected in unfiltered groundwater samples collected from downgradient CAEM wells MW-04, MW-06RR, and MW-12A during the eight most recent sampling events exceeded the applicable compliance limit for both semiannual sampling events conducted in 2001. In addition, total lead

concentrations detected in groundwater samples collected from MW-07 during the eight most recent sampling events exceeded the applicable compliance limit for the September 2001 semiannual sampling event. Total lead was detected in the eight groundwater samples collected from MW-04, seven of the eight groundwater samples collected from MW-06RR, MW-07, and MW-12A, four of the eight groundwater samples collected from MW-08AR, and three of the eight groundwater samples collected from MW-21 used to construct March and September 2001 confidence intervals.

Statistical evaluation indicated dissolved lead concentrations detected in filtered groundwater samples collected from downgradient CAEM wells during the eight most recent sampling events did not exceed the applicable compliance limit for either semiannual sampling event conducted in 2001. Exceedances of the dissolved lead compliance limit previously identified in downgradient CAEM wells MW-03, MW-08AR, MW-12A, and possibly MW-07 during 1999 appear to be the result of fluctuating laboratory detection limits. Beginning in 2000, groundwater data obtained from the eight most recent sampling events used to construct confidence intervals for downgradient CAEM wells were based on a single detection limit of 0.005 ppm.

Dissolved lead was detected in filtered groundwater samples collected from two downgradient CAEM wells during the eight most recent sampling events used to construct first quarter 2001 confidence intervals: MW-06RR during the April 1998 sampling events (0.0167 ppm dissolved lead) and MW-12A during the March and September 2000 sampling events (0.0061 ppm and 0.0051 ppm dissolved lead, respectively). Dissolved lead was detected in filtered groundwater samples collected from two downgradient CAEM wells during the eight most recent sampling events used to construct third quarter 2001 confidence intervals: MW-06RR during the April 1998 and September 2001 sampling events (0.0167 ppm and 0.035 ppm dissolved lead, respectively) and MW-12A during the March and September 2000 sampling events (0.0061 ppm and 0.0051 ppm dissolved lead, respectively).

3.1.2 Summary for 2001 Reporting Period

Statistical exceedances of the compliance limit for the 2001 reporting period were identified for total metals concentrations in six of the seven downgradient CAEM wells. Total metals concentrations detected in groundwater samples collected from supplemental monitoring well MW-21 located off site across Chartiers Creek did not exceed applicable compliance limits for either of the two semiannual sampling events

conducted in 2001. Compared to September 2000 results, additional statistical exceedances of the compliance limit were not identified for the March 2001 sampling event.

Compared to the March 2001 data, one additional statistical exceedance of the compliance limit was identified for the September 2001 sampling event: total lead in unfiltered groundwater samples collected from downgradient CAEM well MW-07. Total lead concentrations detected in unfiltered groundwater samples collected from downgradient CAEM well MW-07 also exceeded the applicable compliance limit for previous sampling events conducted in March and September 1999 and March and September 2000.

The greatest number of statistical exceedances of the compliance limit for the 2001 reporting period were associated with groundwater samples collected from downgradient CAEM wells MW-06RR, MW-07, and MW-12A. The compliance limit was statistically exceeded by only one dissolved metal during the 2001 reporting period: dissolved arsenic concentrations detected in groundwater samples collected from MW-06RR. Some of the calculated statistical exceedances of the compliance limit are based on fluctuating detection limits, laboratory changes, or data collected more than two years ago. Eliminating these artificial exceedances results in the following statistically significant exceedances:

- Total and dissolved arsenic concentrations detected in groundwater samples collected from MW-06RR (March and September 2001)
- Total cadmium concentrations detected in groundwater samples collected from MW-06RR (March and September 2001), MW-07 (March and September 2001), MW-08AR (March and September 2001), and MW-12A (March and September 2001)
- Total chromium concentrations detected in groundwater samples collected from MW-06RR (March and September 2001)
- Total lead concentrations detected in groundwater samples collected from MW-04 (March and September 2001), MW-06RR (March and September 2001), MW-07 (September 2001), and MW-12A (March and September 2001)

Total cadmium concentrations detected in groundwater samples collected from downgradient CAEM well MW-21, and total lead concentrations detected in groundwater samples collected from downgradient CAEM well MW-07 did not statistically exceed the applicable compliance limit during the March 2001 sampling event as they did during the September 2000 sampling event.

Detected metals concentrations may be due, in part, to the presence of suspended solids in the groundwater samples. A review of field notes recorded for the semiannual sampling events indicates that a majority of the groundwater samples collected were slightly too highly turbid. Precautions are being taken to minimize the collection of turbid samples. However, due to the sampling technique, the collection of turbid samples is difficult to avoid.

3.2 Trend Analysis

Historical groundwater data obtained from groundwater samples collected from supplemental monitoring wells MW-02, MW-16, and MW-17 located upgradient of the landfill were evaluated for statistically significant trends in constituent concentrations using the Sen's Slope/Mann-Kendall tests for temporal trends. These tests are used to evaluate the significance of an apparent trend in constituent concentrations and to estimate the magnitude of that trend or whether the trend is statistically different from no trend. In addition, historical groundwater data obtained from site wells are graphically presented in Figure 3-1 through Figure 3-15. Results obtained for multiple samples collected during a single sampling event were averaged for graphing purposes. Results reported as not detected were replaced with values representing one-half the detection limit prior to graphing the data.

Statistically significant increasing trends in constituent concentrations for the March and September 2001 semiannual sampling events were identified for the following constituent/supplemental well pairs: total chromium in MW-02, dissolved chromium in MW-02, MW-16, and MW-17, and dissolved lead in MW-02, MW-16, and, MW-17. Closer inspection of analytical results indicates these trends may be due to fluctuating detection limits and not to increasing constituent concentrations. With the exception of two chromium detections in groundwater samples collected from supplemental well MW-02 prior to 1997, these constituents were not detected in supplemental wells. Therefore, with the exception of the chromium concentration detected in groundwater samples collected from MW-02, valid statistical trends in constituent concentrations were not identified for groundwater samples collected from these wells.

A review of the graphs of the historical data indicates constituent concentrations detected in groundwater samples collected from downgradient wells have generally decreased to below current applicable compliance limits, with the exception of the total cadmium concentration detected in groundwater samples collected from downgradient CAEM well MW-06RR during the September 2001 sampling event, total lead concentrations detected in groundwater samples collected from a few wells during the March and September 2001 sampling events, and dissolved lead concentrations detected in groundwater samples collected from MW-06RR during the September 2001 sampling event. Total cadmium concentrations also exceeded the

compliance limit in groundwater samples collected from supplemental well MW-17 located upgradient of the landfill during the March and September 2001 sampling events. In addition, total lead concentrations detected in groundwater samples collected from supplemental well MW-17 during the March 2001 sampling event exceeded the applicable compliance limit.

3.3 Maximum Contaminant Level Comparison

Concentrations of two inorganic constituents, cadmium and lead, were detected above their respective MCLs in groundwater samples collected from the GE-Bridgeville site during the 2001 reporting period. A comparison of analytical results obtained during the March and September 2001 sampling events to applicable MCLs is summarized in Table 2-1 and Table 2-2, respectively. Constituent concentrations detected above applicable MCLs are discussed below.

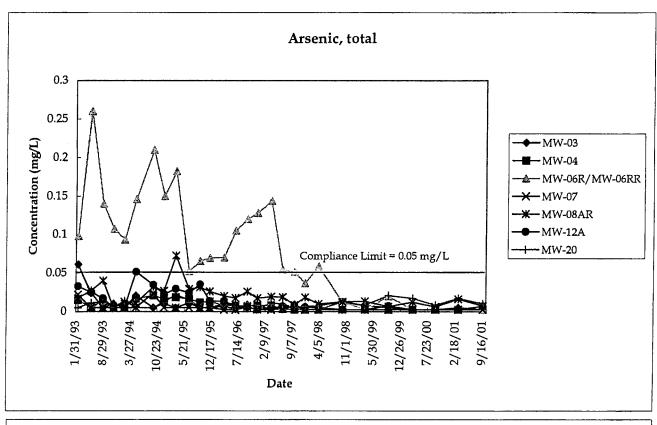
Total cadmium was detected at a concentration exceeding the MCL of 0.005 ppm in the unfiltered groundwater sample collected from supplemental monitoring well MW-17 located upgradient from the landfill during the March and September 2001 semiannual sampling events (0.057 ppm and 0.011 ppm, respectively. Total cadmium was also detected at concentrations slightly above the MCL in the unfiltered groundwater samples collected from downgradient CAEM well MW-06RR (0.0074 ppm) during the September 2001 semiannual sampling event. Total cadmium was not detected in the remaining groundwater samples collected during the two semiannual sampling events. Dissolved cadmium was not detected in filtered groundwater samples collected from CAEM wells or supplemental wells during either sampling event. Total cadmium has been routinely detected above the MCL in groundwater samples collected from upgradient supplemental well MW-17. These results suggest the presence of cadmium in site groundwater may be due to off-site influences or cadmium is naturally occurring.

An MCL does not currently exist for lead. However, the action level for lead is 0.015 ppm. The action level is the concentration of a constituent that, if exceeded, triggers treatment or other requirements that a water system must follow. Total lead was detected at a concentration above the action level in unfiltered groundwater samples collected from downgradient CAEM wells MW-04 (0.023 ppm), MW-06RR (0.018 ppm), and MW-07 (0.03 ppm) and supplemental well MW-17 (0.027 ppm) located upgradient of the landfill during the March 2001 semiannual sampling event. Total lead was also detected at a concentration equivalent to the action level for lead in groundwater samples collected from downgradient CAEM well MW-08AR (0.005 ppm) and below the action level in groundwater samples collected downgradient CAEM well MW-12A (0.0097 ppm) during the March 2001 sampling event. Dissolved lead was not detected in groundwater samples collected from CAEM wells or supplemental wells during the March 2001 semiannual sampling event. During the September 2001 semiannual sampling event, total lead was detected above the applicable action level in unfiltered groundwater

samples collected from downgradient CAEM wells MW-04 (0.023 ppm) and MW-06RR (0.15 ppm). Total lead was also detected in the unfiltered groundwater sample collected from supplemental monitoring well MW-16 (0.011 ppm) located off site across Chartiers Creek at concentrations below the applicable action level. In addition, dissolved lead was detected in the filtered groundwater sample collected from downgradient CAEM well MW-06RR (0.035 ppm) at a concentration exceeding the applicable action level. With the exception of MW-06RR, dissolved lead was not detected in groundwater samples collected from CAEM wells or supplemental wells during the September 2001 sampling event. These results suggest total lead concentrations may be associated with solids present in the sample and, therefore, are not representative of groundwater quality.

The results of the MCL comparisons indicate that individual constituent concentrations detected in groundwater samples collected during the 2001 reporting period are generally below applicable MCLs or action levels. The total cadmium concentration detected in the groundwater sample collected from downgradient CAEM well MW-06RR during the September 2001 sampling event was similar to the cadmium concentration detected in the groundwater sample collected from supplemental well MW-17. Therefore, cadmium concentrations detected in site groundwater may be due to off-site influences or are naturally occurring. Exceedance of the action level for lead was limited to total lead concentrations detected in groundwater samples collected from three downgradient CAEM wells and one upgradient supplemental well and dissolved lead concentrations detected in groundwater samples collected from one downgradient CAEM well during the 2001 reporting period. With the exception of downgradient CAEM MW-12A, dissolved lead was not detected in groundwater samples collected from these wells. Therefore, total lead detections are likely associated with solids present in the groundwater sample and are not representative of groundwater quality.

Figure 3-1
Time vs. Concentration Graphs
Downgradient Wells



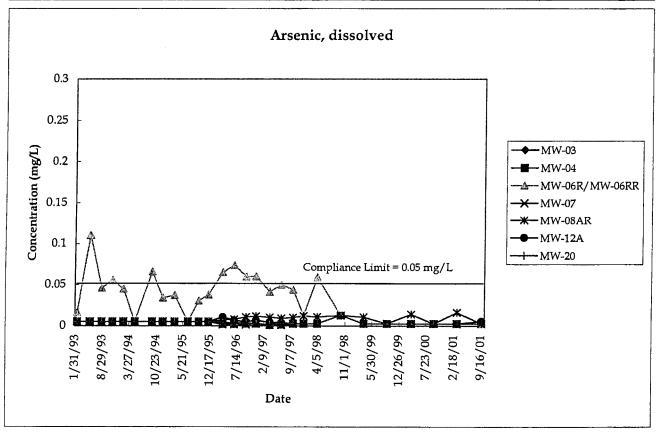
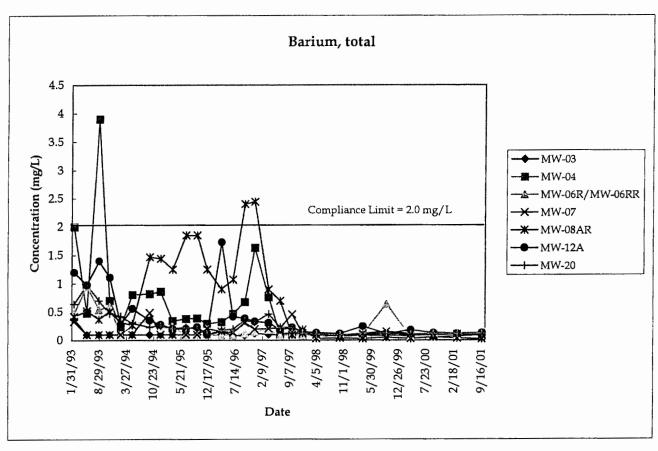


Figure 3-2
Time vs. Concentration Graphs
Downgradient Wells



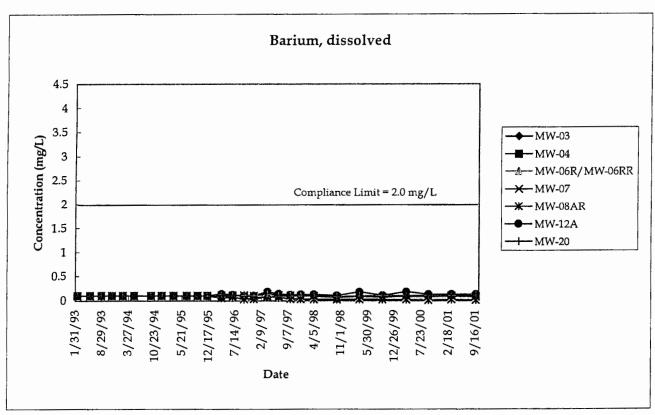
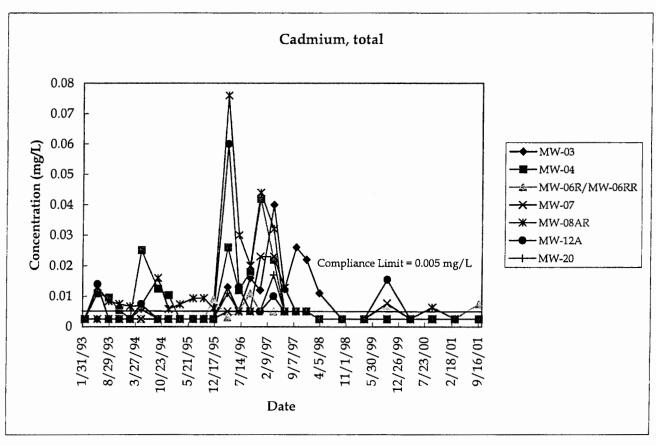


Figure 3-3
Time vs. Concentration Graphs
Downgradient Wells



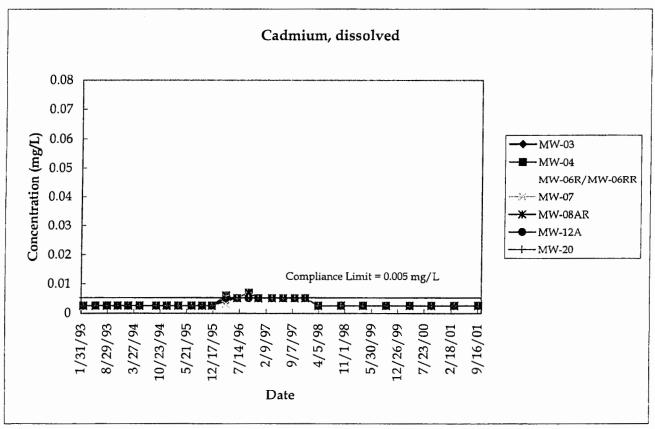
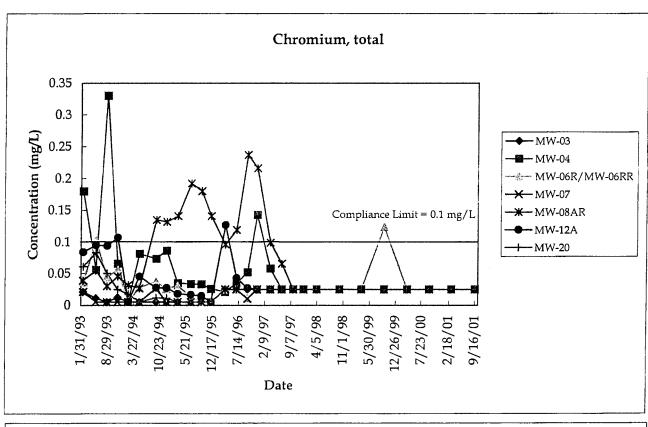


Figure 3-4
Time vs. Concentration Graphs
Downgradient Wells



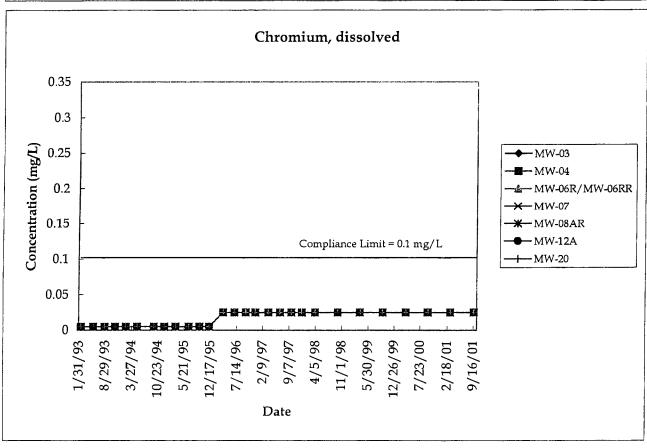
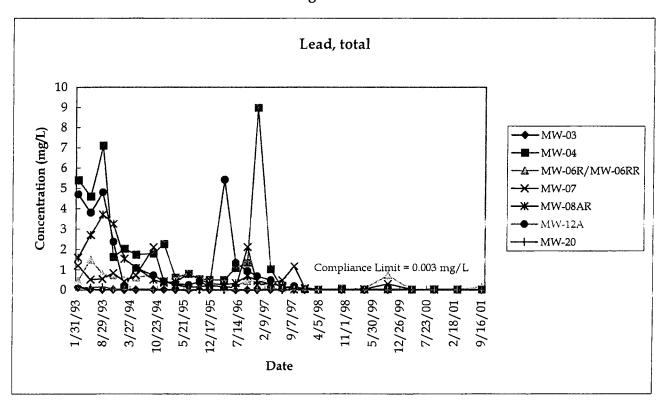
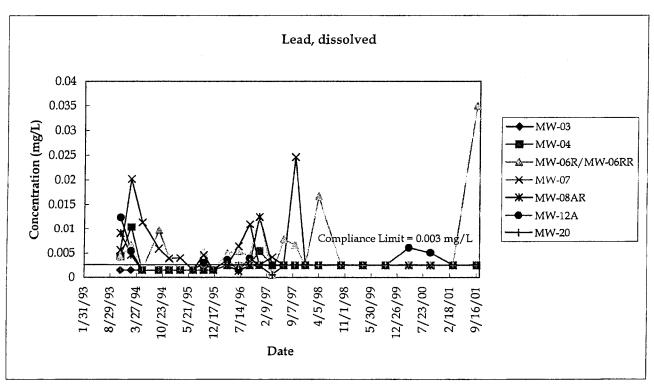
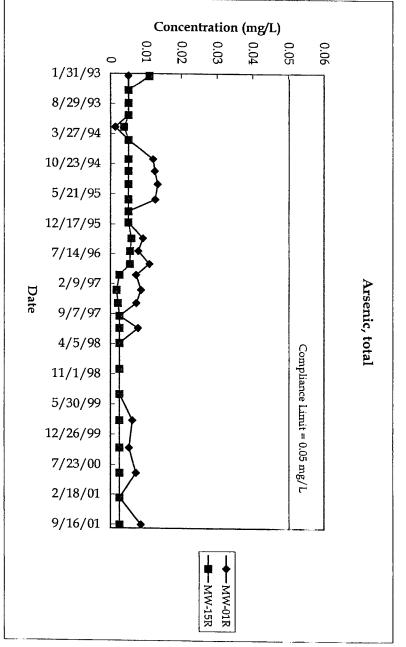


Figure 3-5
Time vs. Concentration Graphs
Downgradient Wells





Concentration (mg/L) 0.01 0.02 0.030.04 0.050.06 1/31/93 8/29/93 3/27/94 10/23/94 5/21/95 12/17/95 7/14/96 Arsenic, dissolved 2/9/97 Date 9/7/97 4/5/98 Compliance Limit = 0.05 mg/L11/1/98 5/30/99 12/26/99 7/23/00 2/18/01 9/16/01 MW-01R



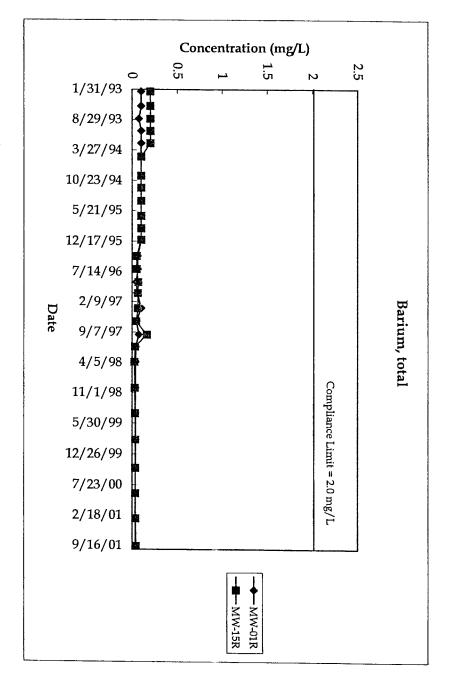
Time vs. Concentration Graph

Figure 3-6

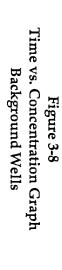
Background Wells

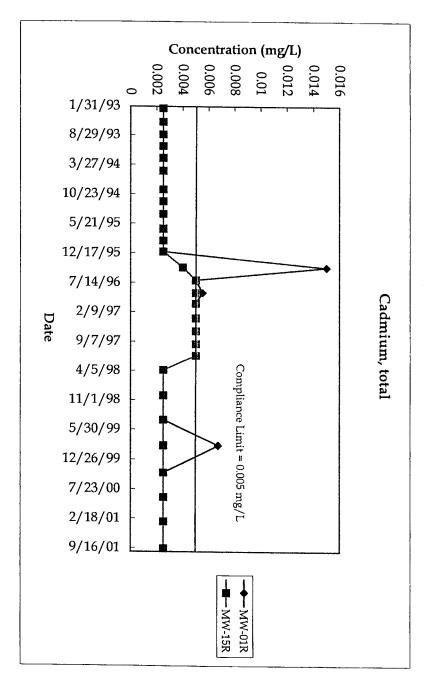
Concentration (mg/L) 0.5 1.5 2.5 N 1/31/93 8/29/93 3/27/94 10/23/94 5/21/95 12/17/95 7/14/96 Barium, dissolved 2/9/97 Date 9/7/97 4/5/98 Compliance Limit = 2.0 mg/L11/1/98 5/30/99 12/26/99 7/23/00 2/18/01 9/16/01 ◆MW-01R

Figure 3-7
Time vs. Concentration Graph
Background Wells

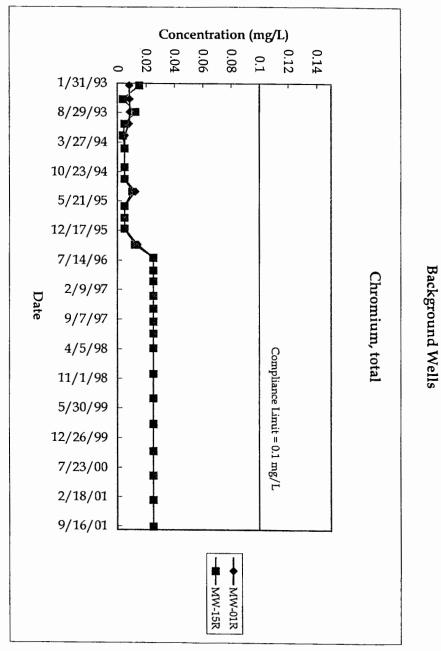


Concentration (mg/L) 0.002 0.004 0.006 0.008 0.012 0.0140.016 0.01 1/31/93 8/29/93 3/27/94 10/23/94 5/21/95 12/17/95 7/14/96 Cadmium, dissolved 2/9/97 Date 9/7/97 Compliance Limit = 0.005 mg/L 4/5/98 11/1/98 5/30/99 12/26/99 7/23/00 2/18/01 9/16/01 ◆ MW-01R



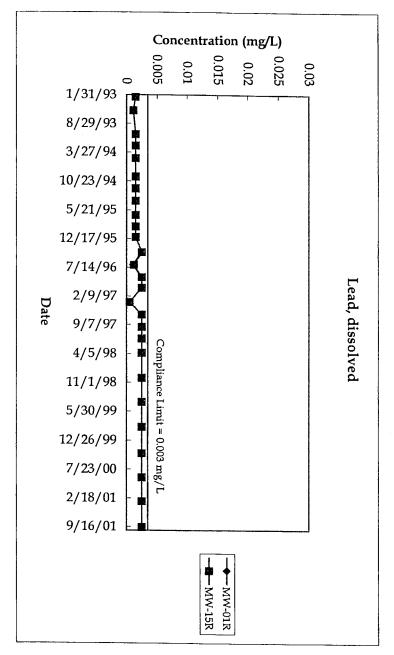


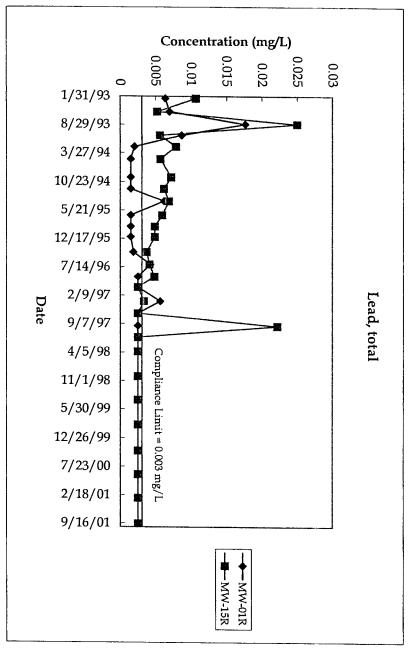
Concentration (mg/L) 0.02 0.04 0.06 0.08 0.12 0.14 0.1 1/31/93 8/29/93 3/27/94 10/23/94 5/21/95 12/17/95 7/14/96 Chromium, dissolved 2/9/97 Date 9/7/97 4/5/98 Compliance Limit = 0.1 mg/L 11/1/98 5/30/99 12/26/99 7/23/00 2/18/01 9/16/01 -- MW-15R MW-01R

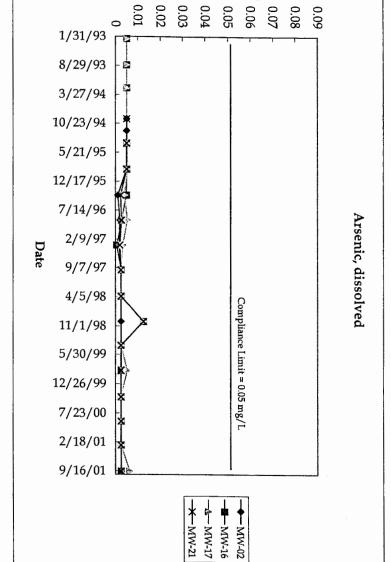


Time vs. Concentration Graph

Figure 3-9







Concentration (mg/L)

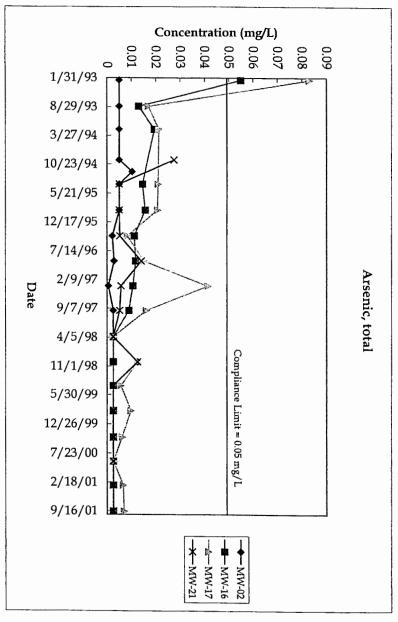


Figure 3-12
Time vs. Concentration Graphs
Supplemental Wells

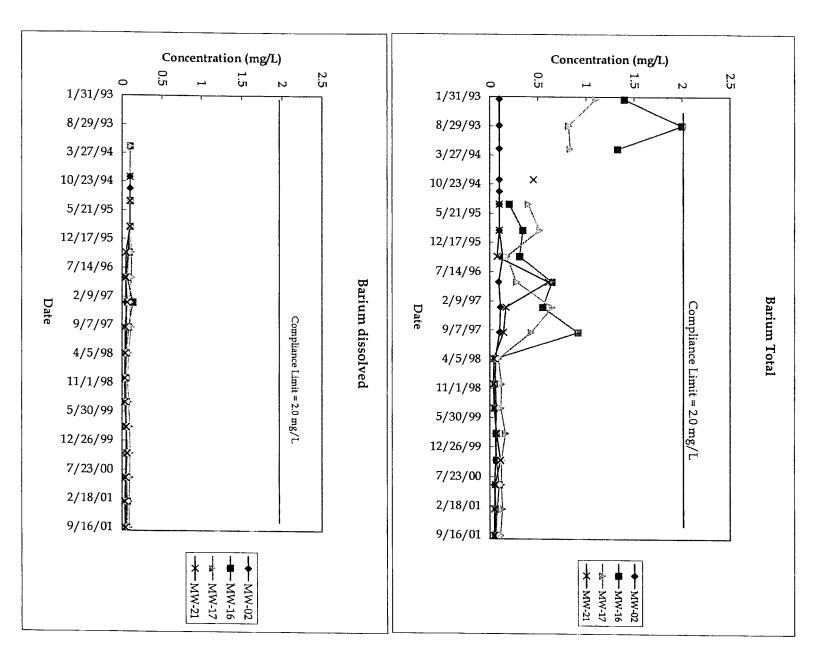
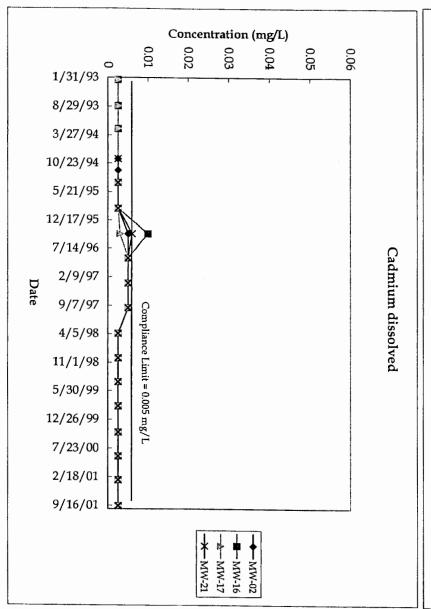
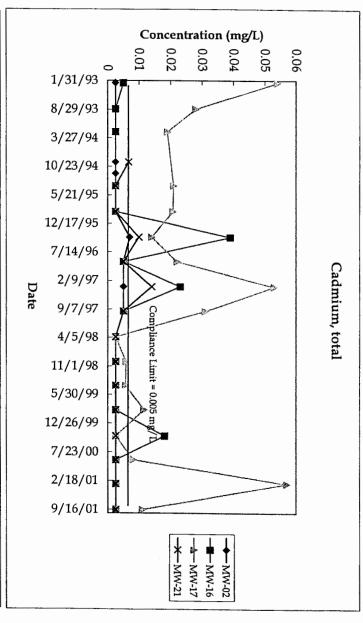
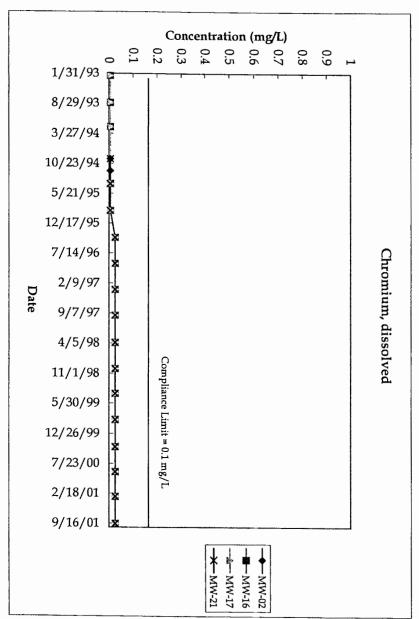


Figure 3-13 Time vs. Concentration Graphs Supplemental Wells







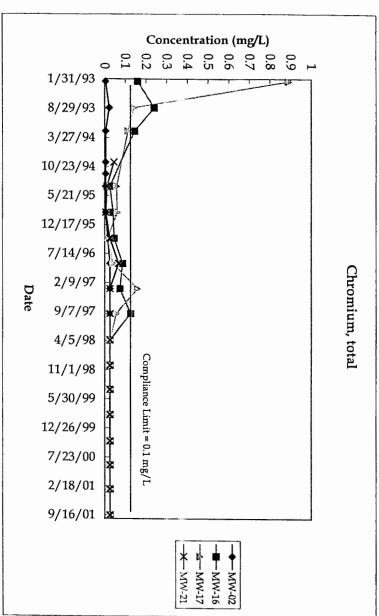


Figure 3-15 Time vs. Concentration Graphs Supplemental Wells

Lead, total

0.8

1.2

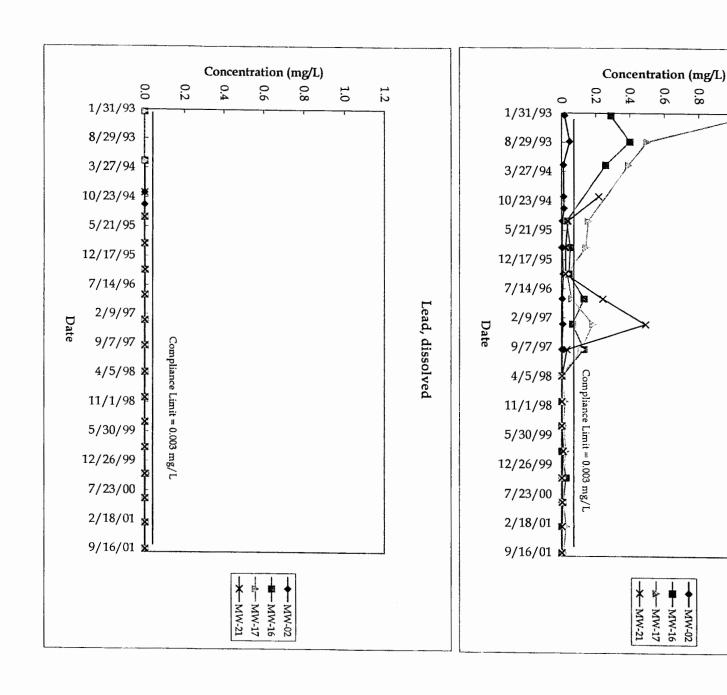


Table 3-1 Compliance Limits 2001 Reporting Period

		MARC	H 2001	SEPTEMBER 2001		
CONSTITUENT	MCL (mg/L)	BACKGROUND MEAN (mg/L)	COMPLIANCE LIMIT (mg/L)	BACKGROUND MEAN (mg/L)	COMPLIANCE LIMIT (mg/L)	
Arsenic, total	0.05	0.004	0.05	0.004	0.05	
Arsenic, dissolved	0.05	0.003	0.05	0.003	0.05	
Barium, total	2.0	0.03	2.0	0.03	2.0	
Barium, dissolved	2.0	0.03	2.0	0.03	2.0	
Cadmium, total	0.005	0.003	0.005	0.003	0.005	
Cadmium, dissolved	0.005	0.003	0.005	0.003	0.005	
Chromium, total	0.1	0.03	0.1	0.03	0.1	
Chromium, dissolved	0.1	0.03	0.1	0.03	0.1	
Lead, total	0.015 (1)	0.003	0.003 (2)	0.003	0.003 (2)	
Lead, dissolved	0.015 (1)	0.003	0.003 (2)	0.003	0.003 (2)	

⁽¹⁾ MCL does not exist for lead. The action level for lead is 0.015 mg/L.

⁽²⁾ If an MCL does not exist for a particular constituent, the modified permit requires that the compliance limit be defined as the constituent-specific moving average background concentration.

Table 3-2 Summary of Statistical Testing Results for March and September 2001

CONSTITUENT	SAMPLE LOCATION							
	MW-03	MW-04	MW-06RR(1)	MW-07	MW-08AR	MW-12A	MW-20	MW-21
Arsenic, total	_	_	=+	_	_	_	_	_
Arsenic, dissolved	_	_	=+	_	_	_	_	_
Barium, total	_	_		_	_	_		_
Barium, dissolved	_		_		_	_	_	_
Cadmium, total	=+	_	•	*	=+	=+	_	_
Cadmium, dissolved	_	_	_		_		_	_
Chromium, total		_	=+	_	_		_	_
Chromium, dissolved	_	_	_	_	_	_		_
Lead, total	_	=+	# †	*	_	•	_	
Lead, dissolved		_	_	_	_	_	_	_

⁽¹⁾ Includes evaluation of data collected from MW-06R abandoned on August 27, 1998.

[■] Statistically exceeds the Compliance Limit for the March 2001 sampling event.

[•] Statistically exceeds the Compliance Limit for the September 2001 sampling event.

Does not statistically exceed the Compliance Limit.